

REMARKS IN RESPONSE TO THE OFFICE ACTION:

REMARKS REGARDING AMENDMENTS

Claims 1, 3, and 4 have been amended and claims 2 and 5 have been cancelled. Specifically, claim 1 has been amended to incorporate the limitations of prior dependent claims 2 and 5. Claims 3 and 4 have been amended to depend from independent claim 1 rather than cancelled claim 2. The abstract of the specification has also been amended. Support for the above amendments can be found at least in the original specification, claims, and drawing as no new matter has been added. Assignee respectfully submits that the claims as amended are clearly distinct and patentable over the prior art of record and therefore respectfully request that the Examiner enter these requested amendments and that all claims be allowed.

OBJECTION OF ABSTRACT UNDER M.P.E.P § 608.01(b):

The abstract of the disclosure was objected to because in line 1, the term “as provided” was stated, and in line 3, the term “the present invention” was stated. As discussed above, the abstract has been amended. Specifically, in line 1, the term “as provided” has been deleted, and in line 3, the term “the present invention” has been deleted. The amended abstract has rendered the objection to the abstract as moot.

REJECTION UNDER 35 U.S.C. § 102(b):

Claims 1–44 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,296,066 to Terry et al. (“Terry”). Assignee requests that the Examiner reconsider and withdraw the above rejections in view of the foregoing amendments and the following remarks.

As discussed above, claim 1 has been amended to incorporate the limitations of cancelled claims 2 and 5. Claim 1 as amended requires a fluid manifold in fluid communication with the

one or more flow conduits. Terry does not teach, disclose, or suggest this limitation of amended claim 1. Instead, Terry discloses a plurality of flutes or longitudinal fluid flow passages (98) provided around the inner circumference of the foot of a traction module as shown in Figure 7. There is not a fluid manifold in fluid communication with the plurality of longitudinal flow passages. For at least this reason, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 1 as anticipated by Terry.

Claims 3–4 and 6–8 depend from claim 1, and, thus, incorporate each limitation therein. Therefore, claims 3–4 and 6–8 are allowable for at least the same reason as independent claim 1. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 3–4 and 6–8 as anticipated by Terry.

Terry does not teach, disclose, or suggest the limitations of independent claim 9. Specifically, Terry does not teach, disclose, or suggest “one or more rearward facing jets extending through the tractor body.” Although Terry does teach the use of a jet as a component of a downhole assembly, Terry does not teach, disclose, or suggest “one or more rearward facing jets extending through the tractor body.” In fact, Terry teaches the use of a jet sub 60 attached between adjacent lengths of composite umbilical as shown in Figure 4. For at least this reason, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 9 as anticipated by Terry.

Terry does not teach, disclose, or suggest the limitations of independent claim 10. Specifically, Terry does not teach, disclose, or suggest “removing a sand bed ahead of the tractor by fluidizing the sand particles with the one or more forward facing nozzles to create a sand-laden slurry.” Claim 9 requires running a coiled tubing tractor assembly that includes one or

more forward facing jet nozzles, a jet pump and a tractor. Terry does not teach, disclose, or suggest an assembly with a jet pump. Further, Terry does not teach, disclose or suggest “pumping the sand-laden slurry via the jet pump past the trailing end of the tractor.” Terry discloses the use of a jet nozzle to cut a window in the casing, but Terry does not teach fluidizing sand particles nor does Terry teach pumping the sand-laden slurry. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 10 as anticipated by Terry.

Claims 11–16 depend from claim 10, and, thus, incorporate each limitation therein. Therefore, claims 11–16 are allowable for at least the same reason as independent claim 10. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 11–16 as anticipated by Terry.

Terry does not teach, disclose, or suggest the limitations of independent claim 17. As discussed above, Terry teaches the use of a jet nozzle to cut a window in the casing but does not teach, disclose, or suggest “removing one or more sand beds ahead of the tractor by fluidizing the sand particles with the one or more forward facing nozzles.” Further, Terry does not teach, disclose or suggest “maintaining the sand in fluid suspension with the rearward facing nozzles until the sand particles settle behind the tractor.” Terry also does not disclose, teach, or suggest the forward facing jet nozzles and rearward facing jet nozzles as required by claim 17. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 17 as anticipated by Terry.

Claims 18–20 depend from claim 17, and, thus, incorporate each limitation therein. Therefore, claims 18–20 are allowable for at least the same reason as independent claim 17.

Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 18–20 as anticipated by Terry.

Terry does not teach, disclose, or suggest the limitations of independent claim 21. As discussed above, Terry does not disclose, teach, or suggest the use of a jet to fluidize sand beds. Claim 21 requires “a forward jetting assembly operable to fluidize sand beds ahead of a coiled tubing tractor.” Further, Terry does not disclose, teach, or suggest the use of a jet pump as required by claim 21. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 21 as anticipated by Terry.

Claims 22–28 depend from claim 21, and, thus, incorporate each limitation therein. Therefore, claims 22–28 are allowable for at least the same reasons as independent claim 21. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 22–28 as anticipated by Terry.

Terry does not teach, disclose, or suggest the limitations of independent claim 29. As discussed above, Terry does not disclose, teach, or suggest the use of a jet to fluidize sand beds. Claim 29 requires “a forward jetting assembly operable to fluidize sand beds ahead of a coiled tubing tractor.” Additionally, Terry does not disclose, teach, or suggest a forward jetting assembly and a rearward facing nozzle. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 29 as anticipated by Terry.

Claim 30 depends from claim 29, and, thus, incorporates each limitation therein. Therefore, claim 30 is allowable for at least the same reasons as independent claim 29. Assignee

respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claim 30 as anticipated by Terry.

Independent claim 31 requires a coiled tubing tractor assembly comprising one or more forward facing jet nozzles, a jet pump and a tractor. As discussed above, Terry does not teach, disclose, or suggest a forward facing jet nozzle. Further, Terry does not teach, disclose, or suggest a jet pump or a jet nozzle as part of a tractor assembly. Claim 31 further requires “circulating a power fluid through the tractor and out the one or more forward facing jet nozzles to create one or more jet streams in the wellbore ahead of the tractor assembly.” Terry does not teach, disclose, or suggest this limitation. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 31 as anticipated by Terry.

Claims 32–34 depend from claim 31, and, thus, incorporate each limitation therein. Therefore, claims 32–34 are allowable for at least the same reason as independent claim 31. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 32–34 as anticipated by Terry.

Independent claim 35 requires providing a coiled tubing tractor assembly comprising one or more forward facing jet nozzles and one or more rearward facing jet nozzles. As discussed above, Terry does not teach, disclose, or suggest a forward facing jet nozzles and rearward facing jet nozzles. Further, Terry does not teach, disclose, or suggest a jet nozzle as part of a tractor assembly. Claim 35 further requires “circulating a power fluid through the tractor and out the one or more forward facing jet nozzles to create one or more jet streams in the wellbore ahead of the tractor assembly” Terry does not teach, disclose, or suggest this limitation. For at least these

reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 35 as anticipated by Terry.

Claims 36–37 depend from claim 35, and, thus, incorporate each limitation therein. Therefore, claims 36–37 are allowable for at least the same reason as independent claim 35. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 36–37 as anticipated by Terry.

Independent claim 38 requires providing a coiled tubing tractor assembly comprising one or more forward facing jet nozzles, a jet pump, and a tractor. As discussed above, Terry does not teach, disclose, or suggest a forward facing jet nozzle. Further, Terry does not teach, disclose, or suggest a jet pump or a jet nozzle as part of a tractor assembly. Claim 38 further requires “circulating a power fluid through the tractor and out the one or more forward facing jet nozzles to create one or more jet streams in the flowline ahead of the tractor assembly” Terry does not teach, disclose, or suggest this limitation. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 38 as anticipated by Terry.

Claims 39–41 depend from claim 38, and, thus, incorporate each limitation therein. Therefore, claims 39–41 are allowable for at least the same reason as independent claim 38. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 39–41 as anticipated by Terry.

Independent claim 42 requires providing a coiled tubing tractor assembly comprising one or more forward facing jet nozzles and one or more rearward facing jet nozzles. As discussed above, Terry does not teach, disclose, or suggest a forward facing jet nozzles and rearward facing

jet nozzles. Further, Terry does not teach, disclose, or suggest a jet nozzle as part of a tractor assembly. Claim 42 further requires "circulating a power fluid through the tractor and out the one or more forward facing jet nozzles to create one or more jet streams in the flowline ahead of the tractor assembly." Terry does not teach, disclose, or suggest this limitation. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(b) rejection of independent claim 42 as anticipated by Terry.

Claims 43-44 depend from claim 42, and, thus, incorporate each limitation therein. Therefore, claims 43-44 are allowable for at least the same reason as independent claim 42. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(b) rejection of claims 43-44 as anticipated by Terry.

Given the above, Assignee requests that the Examiner indicate the allowance of claims 1, 3-4, and 6-44 in the next paper from the Office. The Examiner is invited to contact the undersigned representative to discuss any issues or questions raised by this paper.

Respectfully submitted,



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